

Marc Wolstenholme
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Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,
Plaintiff,
vs.
RIOT GAMES, INC.,
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

PLAINTIFF'S NOTICE REGARDING
BIFURCATION, LITIGATION
DISADVANTAGES, AND CONTINUED
CONDUCT BY DEFENDANT

Dated this: May 06, 2025

M. WOLSTENHOLME.

[MARC WOLSTENHOLME]

**PLAINTIFF’S NOTICE REGARDING BIFURCATION, LITIGATION
DISADVANTAGES, AND CONTINUED CONDUCT BY DEFENDANT AND RIOT
GAMES’S WIDER COMMUNITY.**

To the Honorable Judge Fernando M. Olguin:

Plaintiff Marc Wolstenholme respectfully submits this notice to address his strong concerns regarding the Defendant’s request for bifurcation of discovery and the broader pattern of conduct that continues to significantly disadvantage Plaintiff’s ability to seek justice in this matter.

Plaintiff opposes bifurcation, as it would not streamline proceedings or narrow issues, but rather frustrate progress, multiply unnecessary motion practice, and deepen the power imbalance already inherent in this case. Defendant has thus far refused to engage in good faith discovery, withheld Rule 26 disclosures, and continues to obstruct the fact-gathering process. Delaying core discovery on the basis of bifurcation will only amplify the already substantial obstacles Plaintiff faces as a self-represented individual litigant.

Additionally, Plaintiff continues to endure coordinated harassment and targeted hostility following each filing, online and via direct contact. This repeated abuse, often reflecting or echoing themes in Defendant’s public statements and litigation posture, creates a chilling

1 effect on Plaintiff's right to pursue this case. The pattern is familiar to anyone who has reviewed
2 Riot's documented litigation history, including post-class action retaliation and tone-deaf public
3 defiance of prior findings of misconduct.

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5 Moreover, during the meet and confer discussion on the 2nd of May, 2025, when
6 asked to condemn the harassment, bomb threats, threats of making AI porn of the Plaintiff's 5-
7 year-old daughter and sending them to her mother and school, The defendant's council Josh
8 Geller, boastfully, almost joyfully claimed that they had been no harassment, I made up the
9 claims, Riot Games had seen no evidence of this and the evidence in the filings is what I say they
10 are but they are not really. This is direct gaslighting and Mr. Geller seemed to take joy in it. He
11 refused to address this conduct or condemn it and even stated that Rit had no intention of
12 addressing the Plaintiff's claims.
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15 Mr. Geller is trying to pin these claims on "Mental Illness" and doing all they can
16 to not address the claims on their merits. Weaponing and even abetting harassment and abuse
17 like this is criminal and it is direct discrimination of disability.
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20 The Plaintiff suffers with complex PTSD and physical injuries, not paranoid
21 schizophrenia. The Plaintiff has recently (Friday 14 February 2025 at 10am) undergone an
22 UpToDate battery of testing and a Neuropsychological assessment which again found no
23 cognitive impairments. This is a consistent finding in all past studies, reports and testing which
24 have taken place for various reasons, mostly medical and war pension tribunals.
25

1 Plaintiff is concerned that Riot and its legal team continue to try to weaponize
2 suffering and disabilities and disadvantages, to gaslight the court and the Plaintiff and this is an
3 unethical legal strategy which crosses into criminal domains.
4

5
6 Plaintiff is also concerned that this motion for bifurcation is not rooted in
7 efficiency but is being used as a strategic weapon to:

8 Shield key facts from being unearthed through discovery,
9 Cement an asymmetrical process,
10 Add more stress, worry, financial burden and harassment to the Plaintiff
11 And project an ongoing culture of legal intimidation, in public and private
12 spheres.
13

14 Plaintiff is concerned that Riot Games is misusing the process to Grandstand.

15 Plaintiff continues to work diligently, despite significant challenges, including
16 financial constraints and anxiety-related health issues exacerbated by Defendant's tactics. It is
17 deeply troubling that rather than engage with the merits of Plaintiff's claims, Defendant appears
18 determined to leverage procedure to exhaust, discredit, and silence.
19

20
21 Plaintiff respectfully urges the Court to consider the real-world impact of
22 bifurcation in this context, not as a neutral procedural adjustment, but as a move likely to
23 embolden further abuse of process and compound existing harms.
24

Declaration of Authenticity:

I, Marc Wolstenholme, declare under penalty of perjury that the statements made are true and accurate

Executed on May 06, 2025, in Coventry, England.

Respectfully submitted,

Signature: *M. WOLSTENHOLME*

Marc Wolstenholme

Plaintiff in Pro Per

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